

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

IN THE MATTER OF THE SEARCH OF  
TWO PRIORITY MAIL PARCELS,  
BEARING TRACKING NUMBERS 9505  
5114 6033 1347 5060 57, AND 9505 5114  
6033 1347 5060 64, CURRENTLY  
LOCATED AT 2300 YORKMONT ROAD,  
CHARLOTTE, NORTH CAROLINA

Case No. 3:21-MJ-00339-DCK

**AFFIDAVIT IN SUPPORT OF  
APPLICATIONS FOR TWO SEARCH WARRANTS**

The undersigned, being duly sworn, deposes and states:

1. I, Kellie Williams, a United States Postal Inspector currently assigned in Charlotte, North Carolina, am tasked with investigating various offenses, including use of the U.S. Mail to transmit and distribute controlled substances in violation of 21 U.S.C. § 841. I have been so employed since 2017. I have received formal classroom training from the U.S. Postal Inspection Service during the twelve-week Postal Inspector Basic Training Academy in Potomac, Maryland. Through my investigations and training, I have become familiar with the methods and techniques employed by individuals committing financial fraud, narcotics smuggling, and money laundering of illicit proceeds, as well as other law violations.

2. This Affidavit is made in support of two Applications for Search Warrants for two United States Postal Service (USPS) parcels (hereafter, “**Suspect Parcel #1**,” “**Suspect Parcel #2**,” and collectively, the “**Suspect Parcels**”).

**FACTS IN SUPPORT OF PROBABLE CAUSE**

3. Descriptions of Parcels:

**Suspect Parcel #1:**

A white cardboard box bearing USPS Priority Mail tracking number 9505 5114 6033 1347 5060 57 entered the mail stream in California on December 13, 2021. It is addressed to “Tyrell, 365 York Rd., Salisbury, NC 28147” with a return address of “90 state route 7, Powhatan Point, Ohio 43942, Apt B”. It is approximately 12.25” x 12.25” x 6” and weighs 3 pounds and 9.50 ounces. Postage affixed is \$22.65.

**Suspect Parcel #2:**

A white cardboard box bearing USPS Priority Mail tracking number 9505 5114 6033 1347 5060 64 entered the mail stream in California on December 13, 2021. It is addressed to “Tyrell, 365 York Rd., Salisbury, NC 28147” with a return address of “90 state route 7, Powhatan Point, Ohio 43942, Apt B.” It is approximately 12.25” x 12.25” x 6” and weighs 3 pounds and 6.20 ounces. Postage affixed is \$22.65.

4. On December 14, 2021, Postal Inspectors in Charlotte, North Carolina, found the **Suspect Parcels** to be suspicious after receiving information from K-9 Officer Cerdan of the Charlotte Mecklenburg Police Department (CMPD). K-9 Officer Cerdan encountered an individual flying inbound from California. K-9 Officer Cerdan’s K-9, Cali, was conducting open-air sniffs in the Charlotte Douglas International Airport and positively alerted to an individual’s luggage. A positive K-9 alert on the individual’s luggage caused Officer Cerdan to conduct further investigation. CMPD officers also located a USPS postal receipt in the individual’s possession. The receipt was from a postal facility in San Mateo, California, and contained tracking information regarding the two **Suspect Parcels**. Once the USPS receipt was located, CMPD officers called Inspector Williams to assist with the investigation. Inspector Williams began utilizing USPS databases and the tracking information located on the receipt to intercept the **Suspect Parcels**. On December 15, 2021, Inspector Williams observed that the **Suspect Parcels** arrived in Charlotte,

North Carolina.

5. I conducted a Name and Address Verification for both **Suspect Parcels**. The results are as follows:

**Suspect Parcel #1-** The sender's address is invalid, and a sender's name is not provided. The recipient address is valid, but the recipient's name is not associated with the address.

**Suspect Parcel #2-** The sender's address is invalid, and a sender's name is not provided. The recipient address is valid, but the recipient's name is not associated with the address.

6. I am aware, through my training and experience, that people who utilize the U.S. Mail to distribute controlled substances and their proceeds commonly use fictitious names and addresses in an attempt to avoid detection by law enforcement agencies. I am also aware, through my training and experience, that California is a known source area for narcotics.

7. I am aware, also through my training and experience, that people often use the U.S. Mail, specifically Express and Priority Mail, for the delivery of controlled substances and proceeds for various reasons, some of which are listed below:

A. Items sent via Express and Priority Mail are considered to be First-Class Mail. Therefore, these items cannot be examined without a federal search warrant.

B. Express and Priority Mail are generally expected to be delivered in one to three days. This assures the sender of expedited delivery.

C. Various dispatch times (times which a mailed item is transported to the next destination) are available to customers upon request and provide the sender an opportunity to have some control as to the arrival of the mailed item.

D. Individuals desiring to either send or receive controlled substances and payments for these substances through the U.S. Mail can do so without having to provide identification. This

reduces the possibility of revealing their true identity.

8. On December 17, 2021, Drug K-9 Handler Officer Bynoe with CMPD was contacted and asked to provide a drug detecting K-9. Officer Bynoe responded to the United States Postal Inspection Service, located in Charlotte, North Carolina, with drug detecting K-9 Alvin on this date.

9. The **Suspect Parcels** were placed into individual lineups in Charlotte, North Carolina, within the Western District of North Carolina. The line-ups consisted of placing a **Suspect Parcel** among four separate but similar control parcels. I observed as K-9 Alvin conducted open-air sniffs among the parcels in each line-up. K-9 Alvin gave a positive passive alert to both **Suspect Parcels** by sniffing the seams and responding passively by sitting next to each **Suspect Parcel**, which is his signal to indicate the scent of a controlled substance. The examinations took place at 11:08 am and 11:09 am on December 17, 2021, respectively.

10. Narcotics Detection K-9 Alvin was certified by the National Police Canine Association (“NPCA”) by a previous handler. K-9 Alvin was certified with Officer Bynoe on November 3, 2020, and most recently on November 2, 2021. K9 Alvin and Officer Bynoe were also certified through an 8-week narcotics K9 course taught by K9 Training Officer A. Betts with CMPD. K-9 Alvin is specifically trained to detect narcotic odors which include marijuana, cocaine, methamphetamine, ecstasy (MDMA), and heroin. During the last 8 months, K-9 Alvin has been allowed to sniff a large number of building interiors, vehicles, packages, parcels, and suitcases. Officer Bynoe continues to conduct additional training in order to maintain K-9 Alvin’s proficiency. K-9 Alvin’s most recent training was completed on February 15, 2021, through February 18, 2021, where K-9 Alvin and Officer Bynoe attended a 32-hour K9 Drug/Explosive Odor Class put hosted by Central Piedmont Community College and taught by Optimum K9

Training LLC.

11. In my training and experience, cash used to purchase controlled substances is usually kept within close proximity of the controlled substances themselves. As such, it is common for residue from the controlled substances to be found on the cash, providing an odor detectable to trained K-9s, such as Alvin.

### **CONCLUSION**

12. Based on the above facts, probable cause exists to believe that both **Suspect Parcel #1** and **Suspect Parcel #2** contain evidence of a crime, contraband, fruits, or other items illegally possessed, or property designed for use, intended for use, or used in committing a crime, in violation of 21 U.S.C. § 841. As such, I respectfully request that the Court issue the requested Search Warrants for the **Suspect Parcels**.

Respectfully submitted,

/s/ Kellie R. Williams

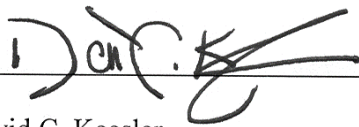
Kellie R. Williams

U.S. Postal Inspector

*This affidavit was reviewed by AUSA Stephanie Spaugh.*

In accordance with Rule 4.1(b)(2)(A), the Affiant attested under oath to the contents of this Affidavit, which was submitted to me by reliable electronic means, on this 21st day of December, 2021, at 3:14 PM.

Signed: December 21, 2021

  
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David C. Keesler  
United States Magistrate Judge

